

REMARKS/ARGUMENTS

1. Double patenting rejection of claims 1, 2, and 16:

5 Claims 1 and 2 are rejected on the ground of nonstatutory obviousness-type double patenting as being unpatentable over claim 1 of U.S. Publication No. 2005/0238246.

10 Claim 16 is rejected on the ground of nonstatutory obviousness-type double patenting as being unpatentable over claim 9 of U.S. Publication No. 2005/0238246.

Response:

 The applicant respectfully submits that claims 1-2 and 16 are patentably distinct from claims 1 and 9 of U.S. Publication No. 2005/0238246.

15 Claim 1 contains the step of constructing a reference matrix based on a data matrix so that the reference matrix comprises a plurality of reference elements each corresponding to a data element of the data matrix. Each reference element of the reference matrix represents whether its corresponding data element fits a default or not. Claim 1 also makes a decision step based on whether each
20 reference element fits the default. When the reference element fits the default, the data element of the data matrix is prevented from being written into memory.

 Claim 2 further specifies that when the data element does not fit the default, the data element is written into the memory.

25 In contrast, claim 1 of U.S. Publication No. 2005/0238246 specifies a method involving counting a number of elements in a data array that are not equal to a predetermined value. Next, a control module reads elements of the data array and determines whether the number of read elements not equal to the
30 predetermined value is equal to the counted number. When the number of read

elements not equal to the predetermined value is equal to the counted number,
then reading elements of the data array is stopped.

5 In the method of the instant application, a judgment is made whether to
write a value into memory for each reference element in the reference matrix
depending on the value of the reference element. However, in claim 1 of U.S.
Publication No. 2005/0238246, a judgment to stop reading is made by comparing
two counted numbers. As the scope of claims 1 and 2 of the instant application
are significantly different from claim 1 of U.S. Publication No. 2005/0238246,
10 the applicant submits that the claims are patentably distinct. Also, the reference
matrix helps, for example, to achieve a faster algorithm for frequency-domain
transform, e.g., the technique shown in Fig. 19 of the instant application.

Claim 16 of the instant application is patentably distinct from claim 9 of U.S.
15 Publication No. 2005/0238246 for the same reasons mentioned above with
respect to claims 1 and 2.

Reconsideration of claims 1, 2, and 16 is therefore respectfully requested.

20 2. Rejection of claims 1-5, 16-20, 28, 29, 33, 34, 37-39, and 42 under 35 U.S.C.
102(b):

Claims 1-5, 16-20, 28, 29, 33, 34, 37-39, and 42 are rejected under 35 U.S.C.
102(b) as being anticipated by Finotello et al. (US 5,903,310).

25 **Response:**

The applicant would like to point out how independent claims 1, 16, 28, 33,
and 38 are patentable over the cited prior art.

Claim 1 recites that a reference matrix is constructed based on a data matrix
30 so that the reference matrix comprises a plurality of reference elements each

corresponding to a data element of the data matrix. Each reference element of the reference matrix represents whether its corresponding data element fits a default or not. Then a decision step is made based on whether each reference element fits the default. When the reference element fits the default, the data element of the data matrix is prevented from being written into memory.

In contrast, Finotello does not teach constructing a reference matrix comprising a plurality of reference elements each corresponding to a data element of a data matrix, where each reference element of the reference matrix represents whether its corresponding data element fits a default or not. Instead, Finotello teaches that encoded pictures can be recognized as pictures subjected to intra-picture encoding (I pictures), as pictures encoded with prediction (P pictures), or as pictures encoded with bi-directional prediction (B pictures). Thus, nearest information that Finotello provides that relates to the claimed default is the kind of encoding used for the pictures: I, P, or B.

Furthermore, Finotello does not teach making a decision based on whether each reference element fits the default, where when the reference element fits the default, the data element of the data matrix is prevented from being written into memory.

Finotello only teaches in column 11, lines 7-16 that when converting images from a system operating at 50 Hz to a system operating at 60 Hz or vice versa, a repeated field (or dormant field) indicator can be used for temporarily disabling writing to memory. However, this repeated field indicator is not stored in a reference matrix that is constructed based on the data elements of the data matrix, as is specified in claim 1. Therefore, Finotello does not teach that a default value stored in a reference matrix is later used to determine whether to write data from the data matrix into memory or not, as is claimed.

For these reasons, the applicant submits that claim 1 is patentable over Finotello. Independent claims 16, 28, 33, and 38 are also patentable over Finotello for the same reasons.

5 Furthermore, claims 2-5, 17-20, 29, 34, 37, 39, and 42 are dependent on claims 1, 16, 28, 33, and 38, and should be allowed if their respective base claims are allowed. Reconsideration of claims 1-5, 16-20, 28, 29, 33, 34, 37-39, and 42 is therefore respectfully requested.

10 3. Rejection of claims 6, 7, 12, 13, 21, and 22 under 35 U.S.C. 103(a):

 Claims 6, 7, 12, 13, 21, and 22 are rejected under 35 U.S.C. 103(a) as being unpatentable over Finotello et al. (US 5,903,310) in view of Kondo et al. (US 5,781,242).

15 **Response:**

 Kondo does not teach constructing a reference matrix comprising a plurality of reference elements each corresponding to a data element of a data matrix, where each reference element of the reference matrix represents whether its corresponding data element fits a default or not. Furthermore, Kondo does not
20 teach making a decision based on whether each reference element fits the default, where when the reference element fits the default, the data element of the data matrix is prevented from being written into memory.

 Instead, Kondo teaches that an address comparator 18 compares RAD and
25 BAD addresses, and sends a standby signal WS to a memory controller 13 according to the comparison result. The value of the standby signal WS determines how the memory controller 13 will access the frame memory 5.

 However, Kondo does not teach constructing a reference matrix, wherein
30 each reference element of the reference matrix represents whether its

corresponding data element fits a default or not, and then making a decision on writing data into memory based on whether each reference element fits the default.

5 Due to the above differences, the applicant respectfully submits that claims
6, 7, 12, 13, 21, and 22 are patentable over the combination of Finotello and
Kondo. In addition, claims 6, 7, 13, 21, and 22 are dependent on claims 1, 12,
and 16, and should be allowed if their respective base claims are allowed.
Reconsideration of claims 6, 7, 12, 13, 21, and 22 is therefore respectfully
10 requested.

4. Rejection of claims 8, 9, 14, 15, 23, 24, and 31 under 35 U.S.C. 103(a):

 Claims 8, 9, 14, 15, 23, 24, and 31 are rejected under 35 U.S.C. 103(a) as
being unpatentable over Finotello et al. (US 5,903,310) and Kondo et al. (US
15 5,781,242), and further in view of Yocom (US 2004/0083227).

Response:

 Claims 8, 9, 14, 15, 23, 24, and 31 are dependent on claims 1, 12, 16, and 28,
and should be allowed if their respective base claims are allowed.
20 Reconsideration of claims 8, 9, 14, 15, 23, 24, and 31 is therefore respectfully
requested.

5. Rejection of claims 11, 25, 30, 35, 36, 40, 41 under 35 U.S.C. 103(a):

 Claims 11, 25, 30, 35, 36, 40, 41 are rejected under 35 U.S.C. 103(a) as
25 being unpatentable over Finotello et al. and further in view of Yocom (US
2004/0083227).

Response:

 Claims 11, 25, 30, 35, 36, 40, 41 are dependent on claims 1, 16, 28, 33, and
30 38, and should be allowed if their respective base claims are allowed.

Reconsideration of claims 11, 25, 30, 35, 36, 40, 41 is therefore respectfully requested.

6. Rejection of claims 10, 26, 27, and 32 under 35 U.S.C. 103(a):

5 Claims 10, 26, 27, and 32 are rejected under 35 U.S.C. 103(a) as being unpatentable over Finotello et al. and further in view of Mitchell et al. (US 4,888,645).

Response:

10 Claims 10, 26, 27, and 32 are dependent on claims 1, 16, and 28, and should be allowed if their respective base claims are allowed. Reconsideration of claims 10, 26, 27, and 32 is therefore respectfully requested.

15 Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Sincerely yours,



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